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May 28, 2003

Ms. Marlene H. Dortch, Secretary
Federal Communications Commission
445 12th Street, S.W., TW-A325
Washington, D.C. 20554

Re: **In the Matter of Second Periodic Review of the Commission's Rules and Policies Affecting the Conversion to Digital Television, MB Docket No. 03-15 Children's Television Obligations of Digital Television Broadcasters, MM Docket No. 00-167**

Dear Ms. Dortch:

Pursuant to Section 1.1206(b) of the Commission's Rules, the Children's Media Policy Coalition ("Coalition") wishes to submit into the record a recently completed study pertaining to the above-referenced proceeding. The study, *Big Media, Little Kids: Media Consolidation & Children's Television Programming*, finds that meeting the television needs of children during the transition to digital television is even more important as stations are decreasing the availability and diversity of children's television programming in the wake of media consolidation.

The research, conducted by Children Now, found that stations are scaling back their children's programming. Specifically, the study found that the number of children's series in Los Angeles has decreased by 47% and the number of hours of children's programming by more than 50%. Most of this decline occurred on stations that are part of media duopolies. The study also found that the number of hours each week that children's programming can be found on the air has decreased by almost one-third since 1998. Furthermore, children's programs in 2003 were nearly four times as likely to be repurposed than in 1998.

The diminishing amount of children's programs demonstrates that the Commission must take steps to provide for children's educational and informational programming needs in the digital broadcasting age. The Commission should ensure, therefore, that any increase in channel capacity that broadcasters choose to implement in the form of multicasting should translate to a commensurate increase in the amount of educational programming available to children, and this programming should also be available on cable and DBS. This recommendation, in light of the decreasing diversity and availability of children's programming due to consolidation, will help ensure that broadcasters better meet their public interest obligations to children.

Pursuant to the Commission's Rules, this submission is being filed electronically through the Commission's Electronic Comment Filing System procedures. Please do not hesitate to contact me at 202-662-9543 should you have any questions regarding this filing.

Sincerely,

James A. Bachtell

Attachment

cc: Patti Miller (Children's Media Policy Coalition)
Angela Campbell (IPR)